

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

Richard F. Boone	:	Civil Action No.: 02-3726
Plaintiff	:	
v.	:	
	:	
Sharon Hill Borough PD; County of	:	
Delaware; Media, PA	:	
Defendants	:	

**MOTION FOR ENLARGEMENT OF TIME OF DEFENDANT SHARON HILL BOROUGH
POLICE DEPARTMENT**

Defendant, Sharon Hill Borough Police Department by and through its attorneys, Holsten & Associates, hereby moves this Honorable Court, pursuant to Fed.R.Civ.P.6(b), for enlargement of time in which to respond to Plaintiff's *Pro Se* Complaint and in support thereof avers the following:

1. On or about August 20, 2002 Defendant Sharon Hill Borough Police Department, received copies of Plaintiff's *Pro Se* Complaint and Summons filed in the above-captioned matter.

2. Defendant promptly forwarded the Complaint and Summons to the insurance brokers for the Defendant, who forwarded them to the insurance carrier located in Scottsdale, Arizona.

3. Counsel for Defendant received the assignment to enter an appearance and defend these Defendants on or about August 29, 2002, and received part of the file materials at that time.

4. In order to properly evaluate and investigate this claim, counsel requests a thirty (30) day extension of time within which to respond to Plaintiff's Complaint.

Wherefore, Defendant respectfully requests that this Honorable Court grant its Motion for Enlargement of Time.

Respectfully Submitted,

HOLSTEN & ASSOCIATES

PAOLA TRIPODI KACZYNSKI, ESQUIRE
One Olive Street
Media, PA 19063
(610) 566-8800
Atty ID No. 59602
Attorney for Defendant, Sharon Hill
Borough PD

Date: _____

CERTIFICATE OF SERVICE

I, Paola Tripodi Kaczynski, Esquire, counsel for Defendant Sharon Hill Borough Police Department, only, state that a true and correct copy of the attached Motion for Enlargement of Time was served upon the following individuals via United States First Class Mail, this _____ day of _____, 2002:

Richard F. Boone, *Pro Se*
36 Bartlett Avenue
Sharon Hill, PA 19079

Robert P. DiDomenicis, Esquire
Holsten & Associates
One Olive Street
Media, PA 19063
Attorney for County of Delaware

Respectfully submitted,

HOLSTEN & ASSOCIATES

PAOLA TRIPODI KACZYNSKI, ESQUIRE
Attorney ID No. 59602
One Olive Street
Media, PA 19063
(610) 566-8800
Attorney for Sharon Hill Borough Police

Department